

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Petition for Emergency Relief Due to)	GN Docket No. 21-304
COVID-Related Delays in 3G Sunset)	
Transition for Central Station Alarm)	
Subscribers)	

To: The Commission

SUPPLEMENT TO PETITION FOR EMERGENCY RELIEF

AICC hereby supplements its May 10, 2021 Petition for Emergency Relief in this proceeding, to reflect in the record recent developments, and to request the immediate issuance of an interim extension of the now imminent AT&T 3G Sunset in light of these developments.

In particular, on Tuesday, February 15, 2022, AT&T posted the following statement on its website: “At the FCC’s urging, we are using roaming options to bridge the IoT transition.”¹ AICC was notified that same day by the Commission’s staff of the signing of an agreement between AT&T and T-Mobile providing for roaming by AT&T 3G customers on T-Mobile’s 3G network (which will continue operating until July 1, 2022), as a temporary measure to mitigate the impact of the AT&T 3G shut down. By coincidence, representatives of AICC had a conference call scheduled with representatives of AT&T that same day, and brought up this development.

¹ [AT&T Guides Customers’ Transition from 3G, Unlocking 5G Benefits - AT&T Connects \(attconnects.com\)](https://attconnects.com), EVP and Chief Regulatory Officer Joan Marsh, February 15, 2022.

Members of AICC have rapidly explored the possible use of this roaming arrangement as an interim solution to allow alarm companies an additional four months in which to replace certain existing 3G alarm radios with 4G devices. At first blush, it appears that this solution may be viable for a number of alarm service providers and their customers. However, time will be needed to explore the viability of the roaming solution for affected alarm companies. In addition, the alarm industry will need to negotiate the necessary arrangements with AT&T and T-Mobile. With only five days left before AT&T plans to shut down its 3G network, there is simply not enough time for such arrangements to be made, and the actual roaming logistics implemented. Therefore, AICC requests the immediate issuance of an interim extension to allow this process to play out. It would be tragic and illogical for the tens of millions of citizens being protected by 3G alarm radios and other devices to be put at risk of death or serious injury, when the Commission was able to broker a possible solution but inadequate time exists to implement that solution.

In particular, it appears based on preliminary investigation by AICC members that a substantial number of existing 3G alarm radios maybe capable of roaming on the T-Mobile 3G network via a modification that can be implemented virtually, without the need for a truck roll. Whether a particular alarm radio can be modified in this way for roaming will depend on the platform on which it was set up when the service was initiated. Many of the alarm radios set up on the newer Cisco Jasper platform can apparently be adapted for roaming. Other 3G alarm radios may not be programmable for such roaming, especially PERS units that are widely used by the elderly, especially Medicaid patients and those requiring monitoring of medical conditions. The solution will also not help those 3G-based alarm customers where T-Mobile does not have 3G coverage. However, if a significant portion of the 3G alarm radios that have not yet been upgraded can roam on the T-Mobile service until July 1, 2022, it can allow the

alarm industry to make do with a much shorter extension of AT&T's 3G sunset, creating a "win-win" situation.

AICC notes that certain measures will be needed in order for the roaming solution to provide genuine relief in avoiding harm to the public from the 3G shut down. In particular:

- It will be necessary for AT&T and T-Mobile to negotiate a master services agreement with the alarm industry which would allow all capable alarm companies to roam on T-Mobile's network through AT&T. AT&T advised AICC during the parties' February 15 call that AT&T would want each individual alarm company to negotiate a separate agreement. Given that there are approximately 13,000 alarm companies, that approach would be a non-starter.
- Even with a master services agreement approach, negotiations will likely take 45 days. Then it will take at least two weeks to activate the roaming capability of the compatible units. At the very least a sunset delay beyond the planned February 22 shut down will be needed. Such delay should be at least 60 to 75 days.

If enough time is provided for the roaming solution to actually be explored and implemented, then the Commission, the alarm industry, AT&T and other affected stakeholders can determine if a further extension period may be needed to protect public safety. Since the bulk of the 500,000 to 600,000 medical emergency response systems (PERS units) do not have built in roaming capability, AICC projects that a further extension may be needed, but certainly a delay of 60 days may help PERS providers retrofit many of their customers, especially since the Omicron variant is waning and the public is getting more comfortable with social interactions. This should allow a much shorter than the original ten-month extension AICC requested, and reflects

the alarm industry's extraordinary efforts to replace 3G radios despite the obstacles it has faced; AICC's belief that the proposed roaming solution can work for enough alarm customers to reduce the scope of the problem; and AICC's good faith effort to compromise.

AT&T's webpage that just announced the possibility of an interim roaming solution on February 15 understandably also touted other measures AT&T has taken to facilitate the 3G transition, as listed below.² AT&T certainly deserves credit for these measures. Unfortunately, as shown by the notes that follow each AT&T measure below (and as documented in AICC's Petition and subsequent Reply Comments and ex parte reports), none of these steps has significantly helped the alarm industry to fully accomplish the 3G transition:

- Starting in February 2019, we notified customers of the future 3G sunset and the need for device upgrades and regularly (in some cases monthly) repeated that notice.
 - Impact on alarm industry: Immediately upon receiving AT&T's 2019 notification, alarm companies began replacing 3G alarm radios, and made good progress. In fact, even prior to AT&T's announcement, many alarm companies began using Telular's LTE/4G alarm radios, and thereby prevented the scope of the 3G retrofit problem from being much larger. Unfortunately, in early 2020 the Pandemic significantly restricted the ability of alarm companies to enter the homes and businesses of their customers; then the worldwide microchip shortage and supply chain issues prevented alarm companies from getting the radios needed to replace 3G devices; and then multiple new strains of Covid renewed customer hesitancy to allow retrofit visits. Thus, the alarm industry was deprived of the majority of the three year transition period that it needed to transition away from 3G.
- We offered customers free and discounted phones, some of which will continue after 3G sunset, ultimately shipping about 2 million replacement phones.
 - Impact on alarm industry: None of the free devices offered by AT&T to its customers included the specialized alarm radios used by central station service providers.

² Id.

- We created a dedicated webpage to provide customers information on how to migrate their devices.
 - Impact on alarm industry: None of the webpage advice applied to the specialized alarm radios used by the alarm industry, or provided information useful in transitioning alarm customers. Unlike cell phones, which willing customers can simply bring to the AT&T stores to replace, alarm radios generally require a visit into the protected premises.
- We certified well over 100 devices for use on AT&T's 4G/5G network, increasing the options for customers to bring their own device.
 - Impact on alarm industry: The only specific alarm device certified by AT&T specifically to ease the 3G transition was the Cellbounce device, which as discussed below was able to put only a small dent in the number of replacement alarm radios needed, in part because it unfortunately was not certified by AT&T for use on its network until 2021.
- We provided over \$100 million in incentives for businesses to replace their devices.
 - Impact on alarm industry: While some alarm companies received incentive money from AT&T, it was unfortunately not sufficient to overcome the Pandemic and supply chain obstacles.
- We collaborated with the alarm industry to build a simple, plug-in, self-install solution to automatically connect 3G alarm service devices to the LTE network.
 - Impact on alarm industry: AT&T did indeed cooperate with the alarm industry's development of the Cellbounce plug-in replacement alarm device. Unfortunately, as described in AICC's Petition (at pp. 7-8), the late approval by AT&T of this device (February 2021) meant that the microchip shortage and supply chain issues had already surfaced, significantly hindering production of Cellbounce units. It was only ever possible to produce up to sixty thousand of this start up device per month, so it was never going to be more than a partial solution. However, the impact of chip shortages significantly reduced production, so unfortunately Cellbounce was unable to substantially reduce the scarcity of replacement alarm radios. In addition, the Cellbounce device could not be used for PERS systems or commercial protection alarm systems.

- We helped IoT customers obtain replacement devices and device certification and streamline device procurement, activation, and configuration.
 - Impact on alarm industry: This did not apply to specialized alarm radios.
- We connected wholesale partners to device/chip set solutions.
 - Impact on alarm industry: This was not done for the alarm industry. As detailed in the Statement of George Brody (attached to AICC's September 14, 2021 Reply Comments as Attachment B, at p. 3), Telular appealed to both Verizon and AT&T for help in obtaining chip sets. Verizon was only able to provide 262 chipsets, and AT&T did not provide any.

As the record in this proceeding shows, allowing AT&T to shut down its 3G network and systems before companies engaged in safety-related activities have been able to manufacture and install replacement equipment will threaten irreparable harm to tens of millions of U.S. citizens. The alarm and personal monitoring industries have been unable to obtain microchips needed to manufacture the required 3G replacement radios due to pandemic-related supply chain disruptions that are beyond anyone's control. The Commission has a responsibility to protect the safety of life and property pursuant to Section 151 of the Communications Act, and the risk of irreparable harm is far too great to let the matter be decided by default. Millions depend on 3G service to support alarms to detect fire, carbon monoxide poison, home invasions and medical emergencies. In addition, the alarm industry works closely with police, fire and other public safety authorities in states, counties and local communities to protect lives and property. If AT&T proceeds with its nationwide 3G network shut down on February 22, 2022, the ability of public safety authorities to do their jobs effectively will be severely compromised. In this regard, it is hard to imagine a type of harm that is more irreparable. Thus, multiple public safety entities have supported the grant of a reasonable extension in this docket. Numerous others have

made it clear in this proceeding that the AT&T 3G shut down will impact their safety. On February 15, 2022, it was reported that “According to global technology intelligence firm ABI Research, this [AT&T 3G shut down] could have a crippling effect on more than 350,000 Class 8 vehicles and many connected cold-chain trailers—vehicles that are essential to the already strained supply chain.” <https://www.abiresearch.com/press/the-imminent-3g-sunset-could-leave-over-350000-us-trucks-in-the-dark-and-further-snarl-the-supply-chain/>. The harmful impact of a premature 3G shut down has been documented in a number of other press sources, as public awareness of this issue continues to grow:

LA Times- If your phone, car or home alarm relies on 3G you need to prepare for a shutdown Feb 2, 2022, <https://www.latimes.com/business/technology/story/2022-02-02/if-your-phone-car-or-home-alarm-relies-on-3g-you-need-to-prepare-for-a-shutdown>

Consumers Notebook, Seattle Washington-3G Wireless Service Will End in 2022, Stranding Millions of Mobile Devices Feb 14, 2022, <https://bit.ly/33oa4xG>
<https://www.nwnewsradio.com/northwest-news/3g-wireless-services-is-coming-to-an-end-millions-of-devices-will-no-longer-work/>

WUSA-TV, Wash DC-Some 'Help I've fallen' devices and more may not work after 5G flips on. Here's what you need to know to protect yourself and those you love Feb 14, 2022, <https://www.wusa9.com/article/news/investigations/5g-3g-shutdown-may-make-some-devices-go-dark-tech/65-cdf7b5f4-f40e-4903-a2cb-ba4c1f6ad288>

Consumers Notebook, Seattle Washington-3G Wireless Service Will End in 2022, Stranding Millions of Mobile Devices Feb 14, 2022, <https://bit.ly/33oa4xG>
<https://www.nwnewsradio.com/northwest-news/3g-wireless-services-is-coming-to-an-end-millions-of-devices-will-no-longer-work/>

Omaha World Herald- Phase out of 3G cell networks could silence some cellphones, medical and alarm devices, Jan 16, 2022, https://omaha.com/business/local/phase-out-of-3g-cell-networks-could-silence-some-cellphones-medical-and-alarm-devices/article_ed04ed46-71a7-11ec-bb40-9bea282b5d60.html

To prevent these irreparable harms, and to allow time for the Commission-brokered roaming solution to be implemented, AICC respectfully requests that the FCC issue an Order directing AT&T to delay decommissioning its 3G network and services until there has been time for

affected parties to take advantage of the roaming option that was just announced two days ago. Such extension should be for at least 60 to 70 days, at which time the Commission can determine if any further extension is needed.

Respectfully submitted,

**ALARM INDUSTRY
COMMUNICATIONS COMMITTEE**

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